

PAGE REPLACEMENT
for the
FINAL CLOSEOUT REPORT FOR IHSS GROUP 800-6

Please replace pages 44 through 46 of your copy of above-referenced report with the pages attached herein.



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- An 8-foot section of metal housing around the NPWL (RCRA Unit 40) adjacent to Building 889 was removed. The remaining line consists of a HDPE line in which the actual waste line resides. The waste line is PVC pipe. The waste line was capped, and the space between the waste line and the HDPE line was filled with grout. The disposition of the waste line will be determined as part of the Building 865 Decontamination and Decommissioning (D&D) Project.

6.0 STEWARDSHIP ANALYSIS

The IHSS Group 800-6 stewardship evaluation was conducted through ongoing consultation with the regulatory agencies. Frequent informal project updates, e-mails, and telephone and personal contact occurred throughout the project. Documentation associated with these contacts is in Appendix B.

6.1 Current Site Conditions

As discussed in Section 3.1, accelerated actions at IHSS Group 800-6 consisted of the excavation of the Building 889 slab, footers, footer walls, upper portions of concrete pillars, sumps and tanks, a small portion of the NPWL, and a large portion of the OPWL in the area (Figure 6). Based on the accelerated action, the following conditions exist at IHSS Group 800-6:

- Potential sources of contamination that existed in IHSS Group 800-6 (i.e., the Building 889 slab and Tank 40) were removed.
- Portions of the NPWL and Valve Vault 4 within IHSS 164.3 were not removed (Figure 6) but will be addressed as part of IHSS Group 000-4.
- Surface and subsurface contaminant concentrations in soil are greater than background means plus two standard deviations or detection limits throughout the IHSS Group.
- All excavated areas within IHSS Group 800-6 were backfilled. Excavated soil was used as backfill in the excavation from which it was removed.
- The site was covered with approximately 6 inches of soil and revegetated.

6.1.1 Near Term Management Recommendations

Because residual contaminant concentrations are low and potential contaminant sources were removed, mitigated or found not to have existed, no specific near-term management techniques are required. Potential contaminant sources and pathways have been removed. Contaminant concentrations in soil remaining at IHSS Group 800-6 do not trigger any further accelerated action. Near-term recommendations include the following:

- Excavation at the site will continue to be controlled through the Site Soil Disturbance Permit process;
- Fencing and signs restricting access will be posted to minimize disturbance to newly-revegetated areas; and

- Site access and security controls and the Soil Disturbance Permit process will remain in place pending implementation of long-term controls.

6.2 Long Term Stewardship Recommendation

Based on remaining environmental conditions at IHSS Group 800-6, no specific long-term stewardship activities are recommended for IHSS Group 800-6 beyond the generally applicable Site requirements that may be imposed on this area in the future, which are dependent upon the final remedy selected. Institutional controls that will be used as appropriate for this area include the following:

- Prohibitions on construction of buildings in the IA;
- Restrictions on excavation or other soil disturbance; and
- Prohibitions on groundwater pumping in the area of IHSS Group 800-6.

No specific engineered controls are recommended as a result of the conditions remaining in IHSS Group 800-6.

No specific environmental monitoring is recommended as a result of the conditions remaining in IHSS Group 800-6.

No specific institutional or physical controls, such as fences are recommended as a result of the conditions remaining in IHSS Group 800-6.

This closeout report and associated documentation will be retained as part of the Rocky Flats administrative record file. These specific long-term stewardship recommendations will also be summarized in the Rocky Flats *Long Term Stewardship Strategy*.

IHSS Group 800-6 will be evaluated as part of the Sitewide Comprehensive Risk Assessment, which is part of the RCRA Facility Investigation/Remedial Investigation (RFI/RI) and Corrective Measures Study/Feasibility Study (CMS/FS) that will be conducted for the Site. The need for and extent of any, more general, long-term stewardship activities will also be analyzed in RFI/RI and CMS/FS and will be proposed as part of the preferred alternative in the Proposed Plan for the Site. Institutional controls and other long-term stewardship requirements for Rocky Flats will ultimately be contained in the Corrective Action Decision/Record of Decision, in any post-closure Colorado Hazardous Waste Act permit that may be required, and in any post-RFCA agreement.

7.0 DEVIATIONS FROM THE ER RSOP

All accelerated action objectives were achieved, except those associated with IHSS 800-164.3. Portions of the NPWL and Valve Vault 4 within IHSS 164.3 were not removed as part of this action. The NPWL and valve vaults will be addressed based on site-wide decisions regarding the NPWL and valve vaults. Any related work and sampling results will be documented in another closeout report at a later date.

8.0 POST-REMEDATION CONDITIONS

Post remediation conditions at UBC 889, Tanks 28 and 40, and IHSS 800-164.3 are described below.

8.1 UBC 889

The Building 889 slab, footing walls, and footers were removed, as well as the top five feet of the concrete pillars. The lower portions of the pillars, therefore, remain. Sumps, waste lines, transite ducts, and underground utilities also were removed, including the tank/sump beneath the eastern portion of the Building 889 slab. Most of the NPWL located east of the Building 889 site remains, including Valve Vault 4, as well as the portion traversing IHSS 164.3 (refer to Figure 6). The remaining line consists of a HDPE line in which the actual waste line resides. The waste line is PVC pipe. The waste line was capped, and the space between the waste line and the HDPE line was filled with grout. The disposition of the waste line will be determined as part of the Building 865 D&D Project. Portions of the OPWL also remain. Sampling results from the soil beneath the items removed (e.g., slab, footing walls, footers, sumps, and waste lines) indicate that all contaminant concentrations are less than RFCA Tier II ALs.

8.2 OPWL Tanks 28 and 40

Tanks 28 and 40 were removed, as well as a portion of OPWL P-10. This line was removed to an area southwest of Valve Vault 4 (refer to Figure 6). The end of the portion remaining was filled with grout (2 ft into the line). Sampling results from the soil beneath the items removed (i.e., tanks, sumps and waste lines) indicate no contaminant concentrations above RFCA Tier II ALs. There was one elevated surface beryllium concentration found prior to the accelerated action, but it did not exceed the Tier II AL by much (2.1 mg/kg vs 1.04 mg/kg) and was considerably less than the Tier I AL (104 mg/kg) (refer to Section 2.5). In addition, the sample location where the elevated concentration was found is not longer representative.

8.3 IHSS 800-164.3

Sampling results in the IHSS indicate that all contaminant concentrations are less than RFCA Tier II ALs. Portions of the NPWL and Valve Vault 4 within IHSS 164.3 were not removed as part of this action. The NPWL and valve vaults will be addressed based on site-wide decisions regarding the NPWL and valve vaults. Any related work and sampling results will also be documented in another closeout report at a later date.

8.4 Residual Contamination

Residual contamination was determined based on pre-accelerated action and accelerated action characterization. Pre-accelerated action characterization indicate no contaminant concentrations in surface and subsurface soils greater than RFCA Tier II ALs, except for beryllium in the surface soil adjacent to Tank 40. However, as stated in Section 8.2, the sample is no longer representative. Accelerated action characterization indicate no contaminant concentrations in surface and subsurface soils greater than RFCA Tier II ALs. Concentrations greater than background plus two standard deviations or RLs at

IHSS Group 800-6 are presented in Table 7 and shown on Figures 7 and 8. Pipelines that were not removed during the accelerated action are shown on Figure 6. As discussed in Section 3.1, pipeline ends were grouted.

SORs for Tier I and Tier II action levels, based on pre-accelerated action and accelerated action data, are listed in Tables 8 and 9 for surface and subsurface soils, respectively. Data from sample locations that are no longer representative were excluded. As shown, SORs are less than 1. SORs for non-radionuclides are presented in Figure 9. SORs for radionuclides are not presented, because results were less than background plus two standard deviations or reporting limits.

9.0 WASTE MANAGEMENT

Waste from the IHSS Group 800-6 accelerated action consisted of concrete, asphalt, soil, and pipeline. Asphalt, underground utilities, and uncontaminated concrete were disposed of as sanitary waste. Because the slab surface contained paint and caulk, it was classified and disposed of as PCB Bulk Product Waste. Contaminated concrete was loaded into metal waste boxes for disposal as low-level waste. The two Tank 28 sumps and the two Tank 40 tanks were first sprayed with Instacote™. Pipeline was placed in metal waste containers for disposal as low-level waste (LLW). These containers were then filled with foam. The transite air ducts were filled with foam, cut up, and disposed of as non-hazardous low-level radioactive waste. Water found in the ducts was pumped into poly tanks and trucked to the Building 891 wastewater treatment plant. Waste types, volumes, and disposition are presented in Table 10. Waste characterization data are summarized in Table 11.

10.0 SITE RECLAMATION

All excavated areas within IHSS Group 800-6 were backfilled. Excavated soil was used as backfill in the excavation from which it was removed. An additional 70 cubic yards (approximate) of fill was brought to the project site for use. In addition, approximately 330 cubic yards of topsoil was brought to the project site to bring excavated areas up to grade. The area was rough graded before the topsoil was distributed over the site. The topsoil was graded, then scarified, and a seed mix consisting of Canada bluegrass was spread over the site using broadcast seeding methods. Hydromulch was applied to conserve moisture and prevent erosion.

11.0 NO LONGER REPRESENTATIVE SAMPLING LOCATIONS

Sampling locations that are no longer representative include the four historical locations next to Tank 40 (i.e., 04795, 04895, 04995 and 05095). These locations were impacted when Tank 40 was excavated. No longer representative sampling locations are shown on Figure 10.